

1 Michael Kind, Esq. (SBN: 13903)
 2 KAZEROUNI LAW GROUP, APC
 3 7854 W. Sahara Avenue
 4 Las Vegas, NV 89117
 5 Phone: (800) 400-6808 x7
 6 FAX: (800) 520-5523
 7 mkind@kazlg.com

8 David H. Krieger, Esq. (SBN: 9086)
 9 HAINES & KRIEGER, LLC
 10 8985 S. Eastern Avenue, Suite 350
 11 Henderson, Nevada 89123
 12 Phone: (702) 880-5554
 13 FAX: (702) 385-5518
 14 dkrieger@hainesandkrieger.com

Attorneys for Plaintiff Lloyd W. Anderson II

12

13

14

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17

18 LLOYD W. ANDERSON II,
 19 Plaintiff,
 20 v.
 21 SHELLPOINT MORTGAGE SE
 22 AND EXPERIAN
 23 INFORMATION SOLUTIONS,
 24 INC.,
 25 Defendants.

Case No.: 2:15-cv-01807-RFB-NJK

**JOINT MOTION TO DISMISS
 WITHOUT PREJUDICE
 DEFENDANT NEW PENN
 FINANCIAL, LLC DBA
 SHELLPOINT MORTGAGE
 SERVICING (ERRONEOUSLY
 SUED AS “SHELLPOINT
 MORTGAGE SE”)**

1 Pursuant to Rule 41(a) of the Federal Rules of Civil Procedure, Plaintiff
2 Lloyd W. Anderson II (“Plaintiff”) and Defendant New Penn Financial, LLC dba
3 Shellpoint Mortgage Servicing (erroneously sued as “Shellpoint Mortgage SE”)
4 (“Shellpoint”) move this Court to dismiss without prejudice Plaintiff’s claims
5 against Shellpoint only. Each party will bear its own costs, disbursements, and
6 attorney fees.

7
8 DATED this 22nd day of June 2016.
9

10 Respectfully submitted,

11
12 **Kazerouni Law Group, APC**

13 By: /s/ Michael Kind
14 Michael Kind, Esq.
15 7854 W. Sahara Avenue
16 Las Vegas, NV 89117
Attorneys for Plaintiff

17 **Lewis Roca Rothgerber Christie LLP**

18 By: /s/ J. Christopher Jorgensen
19 J. Christopher Jorgensen
20 3993 Howard Hughes Parkway, Suite 600
21 Las Vegas, NV 89169
22 *Attorney for Defendant New Penn Financial, LLC*
dba Shellpoint Mortgage Servicing (erroneously
sued as “Shellpoint Mortgage SE”)

23 IT IS SO ORDERED:
24

25 DATED: June 23, 2016.

26
27 
28 RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on June 22, 2016, the foregoing JOINT MOTION TO DISMISS WITHOUT PREJUDICE DEFENDANT NEW PENN FINANCIAL, LLC DBA SHELLPOINT MORTGAGE SERVICING (ERRONEOUSLY SUED AS "SHELLPOINT MORTGAGE SE") was served via CM/ECF to all parties appearing in this case.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind

Michael Kind

7854 W. Sahara Avenue

Las Vegas, NV 89117

KAZEROUNI LAW GROUP, APC
7854 W. Sahara Avenue
Las Vegas, NV 89117